

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NORMAN BLAGMAN, individually and on behalf :
of all others similarly situated, :

Plaintiff, :

-against- :

APPLE INC., AMAZON.COM, INC., GOOGLE INC., :
MICROSOFT CORPORATION, EMUSIC.COM INC., :
THE ORCHARD ENTERPRISES, INC., :
ORCHARD ENTERPRISES NY, INC., :
and John Does 1-10, persons and entities whose identities :
are unknown to Plaintiff but who have performed :
and participated in the unlawful acts alleged herein, :

Defendants. :

Docket No. 12 CIV 5453 (ALC)(JCF)

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NOTICE OF MOTION FOR LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL
ASSISTANCE PURSUANT TO THE HAGUE CONVENTION OF 18 MARCH 1970 ON
TAKING OF EVIDENCE ABROAD IN CIVIL OR CRIMINAL MATTERS

PLEASE TAKE NOTICE that, upon the Declarations of Matthew F. Schwartz and
Norman Blagman in Support of Plaintiff's Motion for a Letter of Request for International
Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on Taking of Evidence
Abroad in Civil or Criminal Matters and the exhibits annexed thereto and the Memorandum in
Support of Motion for a Letter of Request for International Judicial Pursuant to the Hague
Convention of 18 March 1970 on Taking of Evidence Abroad in Civil or Criminal Matters,
Plaintiff Norman Blagman will move this Court, before Hon. James C. Francis, United States
District Court for the Southern District of New York, 500 Pearl Street, New York, New York
10007, as soon as practicable, for an order, pursuant to 28 U.S.C. §1781 and the Hague
Convention, issuing Letters of Request directed to the French Ministry of Justice and the United

Kingdom Foreign and Commonwealth Office. The Letters of Request seek testimony and the production of documents from designated persons located in France and the United Kingdom.

Dated: New York, New York
January 31, 2014

SCHWARTZ & PONTERIO, PLLC

By: /s

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